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Co-Counsel for the Class 10 Liquidation Trust

<hr/>		:	UNITED STATES BANKRUPTCY COURT
In the Matter of:		:	FOR THE DISTRICT OF NEW JERSEY
		:	HON. GLORIA M. BURNS
SHAPES/ARCH HOLDINGS L.L.C., <i>et al.</i> ,		:	CASE NO. 08-14631 (GMB)
		:	(Jointly Administered)
Reorganized Debtors.		:	Chapter 11
		:	
		:	
		:	
		:	
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THE CLASS 10 LIQUIDATION TRUST, by		:	ADV. NO. 10-01377 (GMB)
and through Steven D. Sass, as Trustee,		:	
		:	
Plaintiff,		:	
		:	
v.		:	
		:	
NORTHEAST METAL TRADERS, INC.,		:	STIPULATION MODIFYING
		:	DEADLINES ESTABLISHED IN THE
Defendant.		:	PROCEDURES ORDER DATED
		:	JANUARY 21, 2011
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It is hereby stipulated and agreed by and between Cole, Schotz, Meisel, Forman & Leonard, P.A. and Halperin Battaglia Raicht, LLP, attorneys for plaintiff, The Class 10 Liquidation Trust, by and through Steven D. Sass, as Trustee (“Plaintiff”) and Braverman Kaskey, P.C., attorneys for defendant Northeast Metal Traders, Inc. (“Defendant”), that the “Order Modifying Certain of the Deadlines Established in the Global Procedures Order Dated October 18, 2010” dated as of January 21, 2011 (the “Procedures Order”) is modified for purposes of the above-captioned adversary proceeding as follows:

- i. **Completion of fact discovery:** March 25, 2011.
- ii. **Completion of expert discovery.** June 1, 2011, with Plaintiff’s production of its expert report on or before March 31, 2011 and NEMT’s production of its expert report on or before May 2, 2011.
- iii. **Dispositive motions:** July 1, 2011. Dispositive motions shall be filed by that date and made returnable no later than August 5, 2011.
- iv. **Trial date:** The adversary proceeding shall be set for trial no more than 75 days after July 1, 2011 (September 14, 2011), subject to the Court’s calendar.

<p>NORTHEAST METAL TRADERS, INC., <i>By and through its undersigned counsel,</i></p> <p>By: <u>/s/ David L. Braverman</u> David L. Braverman, Esq. Braverman Kaskey, P.C. One Liberty Place 1650 Market Street, 56th Floor Philadelphia, PA 19103</p> <p>DATED: February 15, 2011</p>	<p>COLE, SCHOTZ, MEISEL, FORMAN & LEONARD, P.A.</p> <p>By: <u>/s/ Felice R. Yudkin</u> Felice Yudkin, Esq.</p> <p>-and-</p> <p>HALPERIN BATTAGLIA RAICHT, LLP Donna H. Lieberman, Esq. Carrie E. Mitchell, Esq. Scott Ziluck, Esq. 555 Madison Avenue, 9th Floor New York, New York 10022 Telephone: (212) 765-9100 Facsimile: (212) 765-0964</p> <p>Co-Counsel for the Class 10 Liquidation Trust</p>
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